



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II
EDISON, NEW JERSEY 08837

August 02, 2005

Gary Coleman, Director of Operations
Summit Research Labs, Huguenot Division
15 Big Pond Road
P.O.Box F
Huguenot, NY 12746-0626

Dear Mr. Coleman:

The US Environmental Protection Agency ("EPA") is currently conducting a removal response action pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) at the former Westwood Chemical Corp. ("Westwood") facility located at 46 Tower Road, Middletown, NY 10941 ("Site"). In this response action, EPA is addressing chemicals that were abandoned by Westwood at the Site following the cessation of business activities by Westwood.

During the course of the CERCLA removal action at the Site, EPA learned that Summit Research Labs ("Summit") conducts a business in Huguenot, NY, similar to that previously conducted by Westwood, and that Summit uses some of the same raw materials to produce similar products. Accordingly, EPA contacted Summit to determine whether Summit would be able to reuse certain of the chemical at the Site. Summit informed EPA that it was familiar with the materials at the Site from prior buy-sell discussions with Westwood, and from prior investigations of the Westwood facility arising from such buy-sell discussions, and that Summit would be able to accept certain materials from the Site that Summit would be able to safely reuse in its business operations. Specifically, Summit represented to EPA that it is familiar with the chemicals that are the subject of Summit's interest as shown on the attached schedule.

EPA determined that transfer of those materials to Summit would allow for the recycling or reuse of those materials and that the transfer would save the cost of disposal of the materials. Accordingly, subject to being able to work out the appropriate logistics, EPA plans to transport the materials to the Summit facility in Huguenot, NY on or around August 08, 2005. EPA will notify Summit prior to the transport of the materials so that Summit may arrange to have a knowledgeable Summit representative present at the Site on Tower Road to monitor the loading of the chemicals and to verify that only interested chemicals are loaded and that none of the subject chemicals are left behind. Summit will also provide adequate staff at its Huguenot facility to allow for the receipt and safe staging of the materials. Summit acknowledges that upon delivery of the materials to it, that Summit will be fully responsible for the safe use or other disposal of the materials.

EPA intends to provide for the transportation of the materials at EPA's cost and EPA will not seek payment from Summit.

EPA requests that you sign, date and return the attached representation and undertaking confirming Summit's use of the materials.

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EPA makes no representations to Summit with respect to the title to or content or identity of the chemicals, nor with respect to the suitability of those materials for Summit's purposes, and this letter does not, and is not intended to create any obligation from EPA to Summit.

Should you have any questions please feel free to contact me on my cell phone (908) 420-4514.

Sincerely,

A handwritten signature in black ink, appearing to read "Dilshad J. Perera", with a stylized flourish at the end.

Dilshad J. Perera, On-Scene Coordinator
Response and Prevention Branch
Emergency and Remedial Response Division
United States Environmental Protection Agency



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I _____ represent to EPA that I am employed by Summit Research Labs ("Summit")

Name, Title

and that I am authorized to make this representation and undertaking to EPA on behalf of Summit. Summit represents to EPA that it will receive and accept chemicals to be transported by EPA to the Summit facility as described in the letter dated August 02, 2005 from EPA to Summit. Summit represents that it is familiar with the chemicals that are the subject of the letter and it undertakes to EPA to safely reuse such chemicals, or safely dispose of any such chemicals that it cannot so reuse, all in compliance with applicable federal, state and local laws and regulations. Summit further represents to EPA that all wastes generated in reprocessing, reusing and recycling of such materials will be disposed of by Summit in compliance with all applicable federal, state and local laws and regulations.

Print Name

Title

Signature

Date

Solids			
Name	Container	#	Total Lbs.
W 200 HBD Powder	Fiber Drum (300 lbs.)	88	26400
W 200 Impalpable Crystal	Fiber Drum (330 lbs.)	36	11880
W 200 PG Crystal	Fiber Drum (308 lbs.)	27	8316
W Zr 60 BDM Powder	Fiber Drum (308 lbs.)	12	3696
Zinc Glycine	Fiber Drum (308 lbs.)	1	308
Glycine	Fiber Drum (308 lbs.)	1	308
Dry Pass	Fiber Drum (308 lbs.)	38	11704
W Zr 30 BDM XF	Fiber Drum (308 lbs.)	2	616
W Zr 35 BDM CP5	Fiber Drum (308 lbs.)	5	1540
W Zr 35 BDM CP10	Fiber Drum (308 lbs.)	2	616
W 200 CP10	Fiber Drum (308 lbs.)	14	4312
W 60 BDM CP10	Fiber Drum (308 lbs.)	7	2156
W Zr 60 BDM CP10	Fiber Drum (308 lbs.)	5	1540
W 170 JMP	Fiber Drum (308 lbs.)	9	2772
W 170 Imp	Fiber Drum (308 lbs.)	14	4312
W 200 CP10 Crystal	Fiber Drum (308 lbs.)	11	3388
W DM 200 Imp Powder	Fiber Drum (308 lbs.)	123	37884
W DM HP4 CP10	Fiber Drum (308 lbs.)	6	330
W DM 200 CP10	Fiber Drum (308 lbs.)	16	880
W DM 200 HP4	Fiber Drum (308 lbs.)	4	220
W DM 200 HP4 LRP	Fiber Drum (308 lbs.)	19	1045
W 200 LBD	Fiber Drum (275 lbs.)	20	5500
W DM 200 Imp Crystal	Fiber Drum (308 lbs.)	5	275
Aluminum Chlorohydrate	Fiber Drum (308 lbs.)	2	110
Calcium Carbonate	50 lb. bag	25	1250
Magnesium Carbonate	50 lb. bag	300	1500
Soda Ash	50 lb. bag	776	38800
Celite	50 lb. bag	95	5225
Glycine	50 lb. bag	64	3520
W Zr 60 BDM Powder	SpaceKraft Box (1000 lbs.)	4	4000
W Zr 35 BDM CP5	Super Sack (1600 lbs.)	2	3200
W Zr 35 B CP10	Super Sack (1600 lbs.)	3	4779
W 200 HBD Powder	Super Sack (1100 lbs.)	7	7700

Liquids			
ACT-542	Tote (250 gal.)	7	1750 gals.
ACT-731	Tote (250 gal.)	5	1250 gals.
AQ-224	Tote (250 gal.)	1	250 gals.
Liquid Caustic Soda - 25%	Tote (350gal.)	2	700 gals.
Westchlor FA 700S - 50%	Tote (350 gal.)	2	700 gals.
Propylene Glycol	Poly Drum (55 Gal.)	4	220 gals.
Sulfuric Acid	Poly Drum (55 Gal.)	35.5	1952.5 gals.

Bulk Liquids	
Aluminum Chlorohydrate Solution (clear liquid product) *Suspected 50% Solution	48,800 gals.